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Counsel to the Debtors and
 Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE EASTERN DISTRICT OF VIRGINIA
 RICHMOND DIVISION

- - - - -	- - - - -	x
In re:	:	Chapter 11
	:	
CIRCUIT CITY STORES, INC.,	:	Case No. 08-35653 (KRH)
<u>et al.</u> ,	:	
	:	
Debtors.	:	Jointly Administered
- - - - -	- - - - -	x

**DEBTORS' FORTY-THIRD OMNIBUS OBJECTION
 TO CLAIMS (DISALLOWANCE OF CERTAIN LATE CLAIMS)**

The debtors and debtors in possession in the above-

captioned cases (collectively, the "Debtors")¹, hereby file their Forty-Third Omnibus Objection to Claims (Disallowance of Certain Late Claims) (the "Objection"), and hereby move this Court, pursuant to sections 105 and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (as amended, the "Bankruptcy Code"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Bankruptcy Rule 3007-1, for an order, the proposed form of which is attached hereto as Exhibit A, granting the relief sought by this Objection, and in support thereof states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Motion under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and this Motion in this district is proper under 28 U.S.C.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Circuit City Stores, Inc. (3875), Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821), Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc. (6796), Sky Venture Corp. (0311), PRAHS, Inc. (n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courchevel, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The address for Circuit City Stores West Coast, Inc. is 9250 Sheridan Boulevard, Westminster, Colorado 80031. For all other Debtors, the address was 9950 Mayland Drive, Richmond, Virginia 23233 and currently is 4951 Lake Brook Drive, Glen Allen, Virginia 23060.

§§ 1408 and 1409. The statutory and legal predicates for the relief requested herein are Bankruptcy Code sections 105, 502, and 503 and Rule 3007 of the Federal Rules of Bankruptcy Procedure.

BACKGROUND

2. On November 10, 2008 (the "Petition Date"), the Debtors filed voluntary petitions in this Court for relief under chapter 11 of the Bankruptcy Code.

3. The Debtors continue to manage and operate their businesses as debtors in possession pursuant to Bankruptcy Code sections 1107 and 1108.

4. On November 12, 2008, the Office of the United States Trustee for the Eastern District of Virginia appointed a statutory committee of unsecured creditors (the "Creditors' Committee"). To date, no trustee or examiner has been appointed in these chapter 11 cases.

5. On November 12, 2008, the Court appointed Kurtzman Carson Consultants LLC ("KCC") as claims, noticing and balloting agent for the Debtors in these chapter 11 cases pursuant to 28 U.S.C. § 156(c).

6. On December 10, 2008, the Court entered that certain Order Pursuant to Bankruptcy Code Sections 105 and 502 and Bankruptcy Rules 2002, 3003(c)(3), and 9007 (I)

Setting General Bar Date and Procedures for Filing Proofs of Claim; and (II) Approving Form and Manner of Notice Thereof (Docket No. 890) (the "Claims Bar Date Order").

7. Pursuant to the Claims Bar Date Order, the deadline for filing all "claims" (as defined in 11 U.S.C. § 105(5)) arising before November 10, 2008 against the Debtors by any non-governmental entity was 5:00 p.m. (Pacific) on January 30, 2009 (the "General Bar Date"). The deadline for governmental units to file claims that arose before November 10, 2009 is 5:00 p.m. (Pacific) on May 11, 2009 (the "Governmental Bar Date"). Pursuant to the Claims Bar Date Order, this Court approved the form and manner of the claims bar date notice, which was attached as Exhibit A to the Claims Bar Date Order (the "Claims Bar Date Notice").

8. On December 17 and 19, 2008, KCC served a copy of the Claims Bar Date Notice on all parties who filed notices of appearance pursuant to Bankruptcy Rule 2002, all of the Debtors' scheduled creditors in these cases, the Debtors' equity holders, and certain other parties (Docket No. 1314). In addition, the Debtors published the Claims Bar Date Notice in The Wall Street Journal (Docket No. 1395) and The Richmond Times-Dispatch (Docket No. 1394).

9. On November 12, 2008, this Court entered that

certain Order Establishing Bar Date for Filing Requests for Payment of Administrative Expense Claims Under Bankruptcy Code Sections 105 and 503(b)(9) and Approving Form, Manner and Sufficiency of Notice of the Bar Date Pursuant to Bankruptcy Rule 9007 (Docket No. 107)(the "503(b)(9) Bar Date Order").

10. Pursuant to the 503(b)(9) Bar Date Order, this Court approved the form and manner of the 503(b)(9) bar date notice, which was attached as Exhibit A to the 503(b)(9) Bar Date Order (the "503(b)(9) Bar Date Notice"). Pursuant to the 503(b)(9) Bar Date Order and 503(b)(9) Bar Date Notice, the bar date for filing proofs of claim asserting administrative priority claims pursuant to section 503(b)(9) of the Bankruptcy Code was on December 19, 2008 (the "503(b)(9) Bar Date").

11. On November 19, 2008, KCC served a copy of the 503(b)(9) Bar Date Notice on the 2002 Service List, all of the Debtors' scheduled creditors in these cases, the Debtors' equity holders, and certain other parties (Docket No. 358). In addition, the Debtors published the 503(b)(9) Bar Date Notice in The New York Times (Docket No. 549), The Wall Street Journal (Docket No. 548), and The Richmond Times-Dispatch (Docket No. 547).

12. On January 16, 2009, the Court authorized the Debtors, among other things, to conduct going out of business sales at the Debtors' remaining 567 stores pursuant to an agency agreement (the "Agency Agreement") between the Debtors and a joint venture, as agent (the "Agent"). On January 17, 2009, the Agent commenced going out of business sales pursuant to the Agency Agreement at the Debtors remaining stores. As of March 8, 2009, the going out of business sales at the Debtors' remaining stores had been completed.

13. On April 1, 2009, this Court entered an Order Establishing Omnibus Objection Procedures and Approving the Form and Manner of Notice of Omnibus Objections (Docket No. 2881)(the "Omnibus Objection Procedures Order").

14. On May 15, 2009, the Court entered that certain Order Pursuant to Bankruptcy Code Sections 105 and 503 and Bankruptcy Rules 2002 and 9007 (I) Setting Administrative Bar Date and Procedures for Filing and Objecting to Administrative Expense Requests and (II) Approving Form and Manner of Notice Thereof (Docket No. 3354) (the "Administrative Claims Bar Date Order").

15. Pursuant to the Administrative Claims Bar Date Order, the deadline for filing all "Administrative Expenses"

(as defined in the Administrative Claims Bar Date Order) against the Debtors by any person or entity was 5:00 p.m. (Pacific) on June 30, 2009 (the "Administrative Claims Bar Date"). Pursuant to the Claims Bar Date Order, this Court approved the form and manner of the claims bar date notice, which was attached as Exhibit A to the Administrative Claims Bar Date Order (the "Administrative Claims Bar Date Notice").

16. On or before May 22, 2009, KCC served a copy of the Administrative Claims Bar Date Notice on all parties who filed notices of appearance pursuant to Bankruptcy Rule 2002, all of the Debtors' scheduled creditors in these cases, the Debtors' equity holders, and certain other parties (Docket Nos. 3397 and 4609). In addition, the Debtors published the Administrative Claims Bar Date Notice in The Financial Times (Docket No. 3970), and The Richmond Times-Dispatch (Docket No. 3969) and The Wall Street Journal (Docket No. 3968).

OBJECTIONS TO CLAIMS

17. As more particularly described herein, the Debtors seek in this Objection the disallowance of certain claims that were filed after the applicable bar date, all as further described herein and pursuant to the form of order

attached hereto as Exhibit A.

18. The claims that are the subject of this Objection may be the subject to additional subsequently filed objections.

19. The Debtors reserve the right to further object to any and all claims, whether or not the subject of this Objection, for allowance, voting, and/or distribution purposes, and on any other grounds. The Debtors reserve the right to modify, supplement and/or amend this Objection as it pertains to any claim or claimant herein.

20. For ease of reference, attached as Exhibit B is an alphabetical listing of all Claimants whose Claims are included in this Objection, with a cross-reference by claim number.

BASIS FOR RELIEF

21. Exhibit C contains a list of claims that were filed after the applicable bar date (the "Late Claims").

22. The Claims Bar Date Order provides in relevant part:

Pursuant to Bankruptcy Rule 3003(c)(3), all "entities" and "persons" (as defined respectively in 11 U.S.C. § 101(15) and (41)), except any governmental unit (as defined in 11 U.S.C. § 101(27)) that are creditors holding or wishing to assert "claims" (as defined in 11 U.S.C. § 101(5)) arising before the Petition Date against any of the Debtors are required to file with the Debtors' Claims Agent (as defined below), on or before 5:00 p.m. (Pacific) on January 30, 2009 (the "General Bar Date") a separate, completed, and executed proof of claim form (conforming substantially to Official Bankruptcy Form No. 10) on account of any such claims in accordance with the procedures set forth below.

. . .

Pursuant to Bankruptcy Rule 3003(c) and Bankruptcy Code section 502(b)(9), any governmental units (as defined in 11 U.S.C. § 101(27)) that are creditors holding or wishing to assert "claims" (as defined in 11 U.S.C. § 101(5)) arising before the Petition Date against any of the Debtors are required to file, on or before 5:00 p.m. (Pacific) on May 11, 2009 (the "Governmental Bar Date") a separate, completed, and executed proof of claim form (conforming substantially to Official Bankruptcy Form No. 10) on account of any such claims in accordance with the procedures set forth below.

. . .

Any creditor that is required to file but fails to file a proof of claim for its claim in accordance with the procedures set forth in this order on or before the General Bar Date, the Governmental Bar Date, or such other date established hereby (as applicable) shall be forever barred, estopped, and enjoined from: (a) asserting any Claim against the Debtors that (i) is in an amount that exceeds the amount, if any, that is set forth in the Schedules as undisputed, noncontingent, and unliquidated or (ii) is of a different nature or in a different classification (any such claim referred to as an "Unscheduled Claim") and (b) voting upon, or receiving distributions under, any plan or plans of reorganization in these chapter 11 cases in respect of an Unscheduled Claim; and the Debtors and their property shall be forever discharged from any and all indebtedness or liability with respect to such Unscheduled Claim.

Bar Date Order, ¶¶ 2, 3, 12

23. The Claims Bar Date Notice provides in relevant part:

CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM

Any creditor that is required to file but fails to file a proof of claim for its Claim in accordance with the procedures set forth herein on or before the General Bar Date, the Governmental Bar Date, or such other date established hereby (as applicable) shall be forever barred, estopped, and enjoined from: (a) asserting any Claim against the Debtors that (i) is in an amount that exceeds the amount, if any, that is set forth in the Schedules as undisputed, noncontingent, and unliquidated or (ii) is of a different nature or in a different classification (any such claim referred to as an "Unscheduled Claim") and (b) voting upon, or receiving distributions under, any plan or plans of reorganization in these chapter 11 cases in respect of an Unscheduled Claim; and the Debtors and their property shall be forever discharged from any and all indebtedness or liability with respect to such Unscheduled Claim. If it is unclear from the Schedules and Statements whether your Claim is disputed, contingent or unliquidated as to amount or is otherwise properly listed and classified, you must file a proof of claim on or before the General Bar Date. Any Entity that relies on the Schedules and Statements bears responsibility for determining that its Claim is accurately listed therein.

Bar Date Notice, p. 5.

24. The 503(b)(9) Bar Date Order provides in relevant part:

Any holder of a Section 503(b)(9) Claim

that fails to file a Section 503(b)(9) Claim Request or a Section 503(b)(9) Motion by the Section 503(b)(9) Bar Date in accordance with the procedure set forth in this Order is forever barred, estopped, and permanently enjoined from asserting its Section 503(b)(9) Claim against the Debtors, their estates, or the property of any of them, and such holder shall not be entitled to receive any distribution in these bankruptcy cases on account of such Section 503(b)(9) Claim or receive further notices regarding such Section 503(b)(9) Claim, absent further order of this Court.

. . .

Any Section 503(b)(9) Claim Request or Section 503(b)(9) Motion that is not timely filed and served in accordance with this Order on or before the Section 503(b)(9) Bar Date, so as to be actually RECEIVED by the deadline and in the manner set forth herein, shall be disallowed, and the holder of such Section 503(b)(9) Claim shall be forever barred, estopped, and permanently enjoined from asserting such Section 503(b)(9) Claim against the Debtors, their estates, or the property of any of them, and such holder shall not be entitled to receive any distribution in these bankruptcy cases on account of such Section 503(b)(9) Claim or receive further notices regarding such Section 503(b)(9) Claim, absent further order of this Court.

503(b)(9) Bar Date Order, ¶¶ 7, 12.

25. The 503(b)(9) Bar Date Notice provides in relevant part:

CONSEQUENCES OF FAILURE TO 503(b)(9) CLAIM REQUEST

ANY PERSON OR ENTITY HOLDING A SECTION 503(b)(9) CLAIM THAT FAILS TO FILE A SECTION 503(b)(9) CLAIM REQUEST ON OR BEFORE THE BAR DATE SHALL BE FOREVER BARRED AND ESTOPPED FROM ASSERTING A SECTION 503(b)(9) CLAIM AGAINST THE DEBTORS, THEIR ESTATES, OR THE PROPERTY OF ANY OF THEM, ABSENT FURTHER ORDER OF THE COURT.

503(b)(9) Bar Date Notice, p. 5.

26. The Administrative Claims Bar Date Order provides in relevant part:

All holders of or those wishing to assert an Administrative Expense, including (without limitation) persons, entities, individuals, partnerships, corporations, estates, trusts, indenture trustees, unions and governmental units, must file an Administrative Expense Request on or before **5:00 p.m. (Pacific) on June 30, 2009** -- the Administrative Bar Date - in accordance with the procedures set forth below.

. . . .

Any person or entity that is required, but fails, to file an Administrative Expense Request for its Administrative Expense in accordance with the procedures set forth in this order on or before the Administrative Bar Date (a) shall be forever barred, estopped, and enjoined from asserting any Administrative Expense against the Debtors and the Debtors shall be forever discharged from any and all indebtedness or liability with respect to such Administrative Expenses and (b) shall not be permitted to receive payment from the Debtors' estates or participate in any distribution under any

plan or plans of liquidation in the Debtors' chapter 11 cases on account of such Administrative Expenses.

Administrative Claims Bar Date Order, ¶¶ 2, 12.

27. The Administrative Claims Bar Date Notice provides in relevant part:

**CONSEQUENCES OF FAILURE TO FILE
ADMINISTRATIVE EXPENSE REQUESTS**

Any holder of an Administrative Request that is required to file (but fails to file) an Administrative Expense Request in accordance with the procedures set forth herein on or before the Administrative Bar Date (a) shall be forever barred, estopped, and enjoined from asserting any Administrative Expense against the Debtors and the Debtors (shall [sic] be forever discharged from any and all indebtedness or liability with respect to such Administrative Expense and (b) shall not be permitted to receive payment from the Debtors estates or participate in any distribution under any plan or plans of liquidation in the Debtors' chapter 11 cases on account of such Administrative Expense.

Administrative Claims Bar Date Notice, p. 5.

28. The disallowance of the Late Claims is appropriate under the applicable Bar Date Order, as well as under applicable law.

29. Bar dates for asserting claims in chapter 11 bankruptcy cases serve extremely important purposes. "The

requirement of a Bar Date in Chapter 11 enables the debtor . . . to establish the universe of claims with which it must deal and the amount of those claims." See In re A.H. Robins Co., Inc., 129 B.R. 457, 459 (Bankr. E.D. Va. 1991).

Premised on the imperative purpose of finality of asserting claims against a debtor, courts have not allowed claims filed by creditors after the bar date, absent special circumstances. See In re Provident Hosp., Inc., 122 B.R. 683, 685 (D. Md. 1990), aff'd, 943 F.2d 49 (4th Cir. 1991) (unpublished opinion) ("Because Bean did not timely file his bankruptcy claim after having been given constitutionally sufficient notice, his claim is barred under well-settled authority, 11 U.S.C. 1141(d) and Bankruptcy Rule 3003(c)(2).").

30. The Late Claims were filed in the present cases after the applicable bar date. Accordingly, pursuant to the applicable Bar Date Order, these Late Claims are "forever barred, estopped, and permanently enjoined from asserting such claim against the Debtors"

31. It is essential for the Debtors to establish the proper liabilities asserted against them. In order to achieve the imperative of finality in the claims process, the Debtors request that this Court disallow, in their

entirety and for all purposes in these bankruptcy cases, the Late Claims in this Objection.

32. The Debtors reserve the right to object to the Late Claims on any other grounds at any time.

RESERVATION OF RIGHTS

33. As noted above, the Debtors reserve their rights to file objections to these Late Claims at a later time on any grounds that bankruptcy or non-bankruptcy law permits. The Debtors likewise reserve the right to modify, supplement and/or amend this Objection as it pertains to any claim or claimant herein.

NOTICE AND PROCEDURE

34. Notice of this Objection has been provided to all claimants with claims that are the subject to this Objection as identified on Exhibit C (the "Claimants"), respectively, and to parties-in-interest in accordance with the Court's Order Pursuant to Bankruptcy Code Sections 102 and 105, Bankruptcy Rules 2002 and 9007, and Local Bankruptcy Rules 2002-1 and 9013-1 Establishing Certain Notice, Case Management and Administrative Procedures (Docket No. 130) (the "Case Management Order"). The Debtors submit that the following methods of service upon the Claimants should be deemed by the Court to constitute due and sufficient service

of this Objection: (a) service in accordance with Federal Rule of Bankruptcy Procedure 7004 and the applicable provisions of Federal Rule of Civil Procedure 4; (b) to the extent counsel for a Claimant is not known to the Debtors, by first class mail, postage prepaid, on the signatory of the Claimant's proof of claim form or other representative identified in the proof of claim form or any attachment thereto; or (c) by first class mail, postage prepaid, on any counsel that has appeared on the Claimant's behalf in the Debtors' bankruptcy cases. The Debtors are serving the Claimant with this Objection and the exhibit on which the Claimant's claim is listed.

35. To the extent any Claimant timely files and properly serves a response to this Objection by 4:00 p.m. on October 27, 2009 as required by the Case Management Order and under applicable law, and the parties are unable to otherwise resolve the Objection, the Debtors request that the Court conduct a status conference with respect to any such responding claimant at 11:00 a.m. on November 3, 2009 and thereafter schedule the matter for a future hearing as to the merits of such claim. However, to the extent any Claimant fails to timely file and properly serve a response to this Objection as required by the Case Management Order

and applicable law, the Debtors request that the Court enter an order, substantially in the form attached hereto as Exhibit A, disallowing such Claimant's claim in its entirety for all purposes in these bankruptcy cases.

**COMPLIANCE WITH BANKRUPTCY RULE 3007 AND
THE OMNIBUS OBJECTION PROCEDURES ORDER**

36. This Objection complies with Bankruptcy Rule 3007(e). Additionally, the Debtors submit that this Objection is filed in accordance with the Omnibus Objection Procedures Order.

WAIVER OF MEMORANDUM OF LAW

37. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in the Motion, the Debtors request that the requirement that all motions be accompanied by a written memorandum of law be waived.

NO PRIOR RELIEF

38. No previous request for the relief sought herein has been made to this Court or any other court.

WHEREFORE, the Debtors request the Court to enter an Order sustaining this Objection and granting such other and further relief as the Court deems appropriate.

Dated: Richmond, Virginia SKADDEN, ARPS, SLATE, MEAGHER &
September 21, 2009 FLOM, LLP
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MCGUIREWOODS LLP

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Counsel for Debtors and Debtors
in Possession

EXHIBIT A

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Counsel to the Debtors and
Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

- - - - - x
In re: : Chapter 11
:
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)
et al., :
:
Debtors. : Jointly Administered
- - - - - x

**ORDER SUSTAINING DEBTORS' FORTY-THIRD OMNIBUS
OBJECTION TO CLAIMS (DISALLOWANCE OF CERTAIN LATE CLAIMS)**

THIS MATTER having come before the Court on the
Debtors' Forty-Third Omnibus Objection to Claims
(Disallowance of Certain Late Claims) (the "Objection"),
which requested, among other things, that the claims
specifically identified on Exhibit C attached to the

Objection be disallowed in their entirety and for all purposes in these bankruptcy cases for those reasons set forth in the Objection; and it appearing that due and proper notice and service of the Objection as set forth therein was good and sufficient and that no other further notice or service of the Objection need be given; and it further appearing that no response was timely filed or properly served by the Claimants being affected by this Order; and it appearing that the relief requested on the Objection is in the best interest of the Debtors, their estates and creditors and other parties-in-interest; and after due deliberation thereon good and sufficient cause exists for the granting of the relief as set forth herein,

IT IS HEREBY ORDERED ADJUDGED AND DECREED THAT:

1. The Objection is GRANTED.

2. The Claims identified on Exhibit A - Late Claims as attached hereto and incorporated herein, are forever disallowed in their entirety for all purposes in these bankruptcy cases.

Dated: Richmond, Virginia
_____, 2009

HONORABLE KEVIN R. HUENNEKENS
UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

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(804) 775-1000

Counsel to the Debtors
and Debtors in Possession

CERTIFICATION OF ENDORSEMENT UNDER LOCAL RULE 9022-1(C)

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Douglas M. Foley
Douglas M. Foley

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Debtors' Forty-Third Omnibus Objection to Claims (Late Claims) - Disallowed

In re: Circuit City Stores, Inc, et al.
Case No. 08-35653 (KRH)

Exhibit B - Claimants and Related Claims Subject To Forty-Third Omnibus Objection to Claims

Claim Holder	Claim	Exhibit
ANDY DOMINGUEZ	14473	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
BJARNSON, BENJAMIN	13053	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
CITY OF CLARKSVILLE DEPARTMENT OF FINANCE & REVENUE	14483	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
FRIESEN, PATRICE	14014	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
HARA KEVIN K	13205	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
HARRISON, DAVID	13027	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
HATZLACHH SUPPLY INC	13219	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
HOUSTON COUNTY REVENUE COMMISSIONER	14549	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
JONES III LOUIS C	13632	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
JULIA MAPES	13707	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
KIRK S CARTER	14478	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
KYLE GORDON TRACEY	13213	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
LAFAYETTE CONSOLIDATED GOVERNMENT	14534	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
MATTHEW KUPFERBERG	13608	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
MOSCATELL, BRENDA LYNN	13228	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
OREGON EMPLOYMENT DEPARTMENT	14488	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
PITTS, WILLIAM	13021	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
QUARLES JANE B	14277	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
RAMIREZ, MARC	13653	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
RAMIREZ, MARCOS ISIDRO	13652	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
REICHEL, SUSAN	13151	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
SANTANGELO, RUSTY	14291	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
TERESA LYNN PASSEN	13739	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
THOMAS GEORGE ASSOCIATES LTD TGA	12288	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
TN DEPT OF TREASURY UNCLAIMED PROPERTY	14567	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
TOMASELLI, STACEY	14435	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
TOSHIBA AMERICA CONSUMER PRODUCTS LLC	14506	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
TOSHIBA AMERICA INFORMATION SYSTEMS INC	14505	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
TRAN, KIEN X	13157	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
WAYNE BERKLEY LUCK	14330	EXHIBIT C - (LATE CLAIMS) - DISALLOWED
WRIGHT, LESLIE	13840	EXHIBIT C - (LATE CLAIMS) - DISALLOWED

EXHIBIT C

CREDITOR'S NAME AND ADDRESS	CLAIM NUMBER	ASSERTED CLAIM AMOUNT *	DATE FILED	DOCKETED DEBTOR
ANDY DOMINGUEZ 2119 BORDEAUX AVE STOCKTON, CA 95210	14473	Secured: Priority: \$1,979.00 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$1,979.00	06/29/2009	CIRCUIT CITY STORES WEST COAST, INC. (08-35654)
BJARNSON, BENJAMIN 594 E 7500S MIDVALE, UT 84047-0000	13053	Secured: Priority: Administrative 503(b)(9): Unsecured: \$176.69 Reclamation: Total: \$176.69	05/21/2009	CIRCUIT CITY STORES, INC. (08-35653)
CITY OF CLARKSVILLE DEPARTMENT OF FINANCE & REVENUE PO BOX 928 CLARKSVILLE, TN 37041-0928	14483	Secured: Priority: \$11,242.65 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$11,242.65	07/13/2009	CIRCUIT CITY STORES, INC. (08-35653)
FRIESEN, PATRICE 1420 SPALDING AVE ATWATER, CA 95301	14014	Secured: Priority: Administrative 503(b)(9): Unsecured: \$15,000.00 Reclamation: Total: \$15,000.00	06/22/2009	CIRCUIT CITY STORES, INC. (08-35653)
HARA KEVIN K 1156 LABRADOR CT NEWMAN, CA 95360	13205	Secured: Priority: \$1,560.06 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$1,560.06	06/05/2009	CIRCUIT CITY STORES, INC. (08-35653)

* "UNL" denotes an unliquidated claim.

EXHIBIT C

CREDITOR'S NAME AND ADDRESS	CLAIM NUMBER	ASSERTED CLAIM AMOUNT *	DATE FILED	DOCKETED DEBTOR
HARRISON, DAVID 5115 VERMONT DRIVE EASTON, PA 18045	13027	Secured: Priority: \$165.96 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$165.96	05/07/2009	CIRCUIT CITY STORES, INC. (08-35653)
HATZLACHH SUPPLY INC 935 BROADWAY NEW YORK, NY 10010	13219	Secured: Priority: Administrative 503(b)(9): \$255,825.84 Unsecured: Reclamation: Total: \$255,825.84	06/09/2009	CIRCUIT CITY STORES, INC. (08-35653)
HOUSTON COUNTY REVENUE COMMISSIONER PO BOX 6406 DOTHAN, AL 36302	14549	Secured: Priority: \$4,144.80 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$4,144.80	08/14/2009	CIRCUIT CITY STORES, INC. (08-35653)
JONES III LOUIS C 17 SPRING HARBOR ALISO VIEJO, CA 92656	13632	Secured: Priority: \$15,000.00 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$15,000.00	06/26/2009	CIRCUIT CITY STORES WEST COAST, INC. (08-35654)
JULIA MAPES 649 EDITH ANN DR AZUSA, CA 91702	13707	Secured: Priority: Administrative 503(b)(9): Unsecured: \$272.48 Reclamation: Total: \$272.48	06/19/2009	CIRCUIT CITY STORES, INC. (08-35653)

* "UNL" denotes an unliquidated claim.

EXHIBIT C

CREDITOR'S NAME AND ADDRESS	CLAIM NUMBER	ASSERTED CLAIM AMOUNT *	DATE FILED	DOCKETED DEBTOR
KIRK S CARTER 5205 W PIUTE AVE GLENDALE, AZ 85308	14478	Secured: Priority: Administrative 503(b)(9): Unsecured: \$1,725.01 Reclamation: Total: \$1,725.01	06/30/2009	CIRCUIT CITY STORES, INC. (08-35653)
KYLE GORDON TRACEY JOYCE E TRACEY 246 CIRCUIT ST NORWELL, MA 02061	13213	Secured: Priority: Administrative 503(b)(9): Unsecured: UNL Reclamation: Total: UNL	06/01/2009	CIRCUIT CITY STORES, INC. (08-35653)
LAFAYETTE CONSOLIDATED GOVERNMENT PO BOX 4024 LAFAYETTE, LA 70502-4024	14534	Secured: Priority: \$6,381.90 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$6,381.90	07/28/2009	CIRCUIT CITY STORES, INC. (08-35653)
MATTHEW KUPFERBERG 69 STONY HILL DR MORGANVILLE, NJ 07751	13608	Secured: Priority: \$98.10 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$98.10	06/25/2009	CIRCUIT CITY STORES, INC. (08-35653)
MOSCATELL, BRENDA LYNN 727 BRASS CASTLE RD BELVIDERE, NJ 07823	13228	Secured: Priority: Administrative 503(b)(9): Unsecured: \$5,500.00 Reclamation: Total: \$5,500.00	06/01/2009	CIRCUIT CITY STORES, INC. (08-35653)

* "UNL" denotes an unliquidated claim.

EXHIBIT C

CREDITOR'S NAME AND ADDRESS	CLAIM NUMBER	ASSERTED CLAIM AMOUNT *	DATE FILED	DOCKETED DEBTOR
OREGON EMPLOYMENT DEPARTMENT EMPLOYMENT DEPARTMENT 875 UNION ST NE RM 107 SALEM, OR 97311	14488	Secured: Priority: \$937.61 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$937.61	07/22/2009	CIRCUIT CITY STORES, INC. (08-35653)
PITTS, WILLIAM 2801 E JOLLY RD 202 LANSING, MI 48910-0000	13021	Secured: Priority: \$97.89 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$97.89	05/18/2009	CIRCUIT CITY STORES, INC. (08-35653)
QUARLES JANE B 9021 WELDON DR RICHMOND, VA 23229	14277	Secured: Priority: \$29,722.37 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$29,722.37	06/30/2009	CIRCUIT CITY STORES, INC. (08-35653)
RAMIREZ, MARC 15919 SE MCLOUGHLIN BLVD 9 MILWUALIE, OR 97267-0000	13653	Secured: Priority: \$625.77 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$625.77	06/26/2009	CIRCUIT CITY STORES, INC. (08-35653)
RAMIREZ, MARCOS ISIDRO 15919 SE MCLOUGHLIN BLVD 9 MILWUALIE, OR 97267	13652	Secured: Priority: Administrative 503(b)(9): Unsecured: \$625.77 Reclamation: Total: \$625.77	06/26/2009	CIRCUIT CITY STORES, INC. (08-35653)

* "UNL" denotes an unliquidated claim.

EXHIBIT C

CREDITOR'S NAME AND ADDRESS	CLAIM NUMBER	ASSERTED CLAIM AMOUNT *	DATE FILED	DOCKETED DEBTOR
REICHEL, SUSAN 1550 SPRINGTOWN BLVD NO 6C LIVERMORE, CA 94551	13151	Secured: Priority: \$1,216.89 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$1,216.89	06/09/2009	CIRCUIT CITY STORES, INC. (08-35653)
SANTANGELO, RUSTY PO BOX 536423 ORLANDO, FL 32853-6423	14291	Secured: Priority: \$481.00 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$481.00	06/29/2009	CIRCUIT CITY STORES PR, LLC (08-35660)
TERESA LYNN PASSEN 7138 TILGHMAN DR PARSONSBURG, MD 21849	13739	Secured: Priority: Administrative 503(b)(9): Unsecured: \$15,000.00 Reclamation: Total: \$15,000.00	06/22/2009	CIRCUIT CITY STORES, INC. (08-35653)
THOMAS GEORGE ASSOCIATES LTD TGA INSURANCE RECOVERY DIVISION PO BOX 30 E NORTHPORT, NY 11731-0030	12288	Secured: Priority: Administrative 503(b)(9): Unsecured: \$1,050.00 Reclamation: Total: \$1,050.00	04/14/2009	CIRCUIT CITY STORES, INC. (08-35653)
TN DEPT OF TREASURY UNCLAIMED PROPERTY C O TN ATTY GENERAL BANKRUPTCY DIV PO BOX 20207 NASHVILLE, TN 37202-0207	14567	Secured: Priority: Administrative 503(b)(9): Unsecured: \$200,545.81 Reclamation: Total: \$200,545.81	08/20/2009	CIRCUIT CITY STORES, INC. (08-35653)

* "UNL" denotes an unliquidated claim.

EXHIBIT C

CREDITOR'S NAME AND ADDRESS	CLAIM NUMBER	ASSERTED CLAIM AMOUNT *	DATE FILED	DOCKETED DEBTOR
TOMASELLI, STACEY 2141 JILL WAY UPLAND, CA 91784	14435	Secured: Priority: Administrative 503(b)(9): Unsecured: \$777.81 Reclamation: Total: \$777.81	07/01/2009	CIRCUIT CITY STORES WEST COAST, INC. (08-35654)
TOSHIBA AMERICA CONSUMER PRODUCTS LLC C O LEITESS LEITESS FRIEDBERG & FEDDER PC 10451 MILL RUN CIR STE 1000 ONE CORPORATE CTR OWINGS MILLS, MD 21117	14506	Secured: Priority: Administrative \$5,293,249.00 503(b)(9): Unsecured: \$1,100,432.50 Reclamation: Total: \$6,393,681.50	07/16/2009	CIRCUIT CITY STORES, INC. (08-35653)
TOSHIBA AMERICA INFORMATION SYSTEMS INC C O LEITESS LEITESS FRIEDBERG & FEDDER PC 10451 MILL RUN CIR STE 1000 ONE CORPORATE CTR OWINGS MILLS, MD 21117	14505	Secured: Priority: Administrative \$5,043,759.28 503(b)(9): Unsecured: \$9,357,099.05 Reclamation: Total: \$14,400,858.33	07/16/2009	CIRCUIT CITY STORES, INC. (08-35653)
TRAN, KIEN X 9568 W FRANK AVE PEORIA, AZ 85382	13157	Secured: Priority: Administrative 503(b)(9): Unsecured: \$1,802.17 Reclamation: Total: \$1,802.17	06/08/2009	CIRCUIT CITY STORES, INC. (08-35653)
WAYNE BERKLEY LUCK WAYNE B LUCK 8954 KINGS CHARTER DR MECHANICSVILLE, VA 23116	14330	Secured: Priority: \$210,000.00 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$210,000.00	07/01/2009	CIRCUIT CITY STORES, INC. (08-35653)

* "UNL" denotes an unliquidated claim.

EXHIBIT C

CREDITOR'S NAME AND ADDRESS	CLAIM NUMBER	ASSERTED CLAIM AMOUNT *	DATE FILED	DOCKETED DEBTOR
WRIGHT, LESLIE 9223 MONTROSE DETROIT, MI 48228-0000	13840	Secured: Priority: \$124.38 Administrative 503(b)(9): Unsecured: Reclamation: Total: \$124.38	06/29/2009	CIRCUIT CITY STORES, INC. (08-35653)

Total: 31 \$21,576,619.79

* "UNL" denotes an unliquidated claim.

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Counsel to the Debtors and
Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

- - - - - x
In re: : Chapter 11
:
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)
et al., :
:
Debtors. : Jointly Administered
- - - - - x

**NOTICE OF DEBTORS' FORTY-THIRD OMNIBUS OBJECTION
TO CLAIMS (DISALLOWANCE OF CERTAIN LATE CLAIMS)**

PLEASE TAKE NOTICE THAT the above-captioned Debtors (the "Debtors") filed the Debtors' Forty-Third Omnibus Objection to Claims (Disallowance of Certain Late Claims) (the "Objection") with the Bankruptcy Court. A copy of the Objection is attached to this notice (this "Notice") as Exhibit 1. By the Objection, the Debtors are seeking to disallow certain claims.

PLEASE TAKE FURTHER NOTICE THAT on April 1, 2009, the Bankruptcy Court entered the Order Establishing Omnibus Objection Procedures and Approving the Form and Manner of the Notice of Omnibus Objections (Docket No. 2881) (the

"Order"), by which the Bankruptcy Court approved procedures for filing omnibus objections to proofs of claim and requests for allowance and payment of administrative expenses and/or cure claims (collectively, the "Claims") in connection with the above-captioned chapter 11 cases (the "Omnibus Objection Procedures").

Specifically, the Objection seeks to disallow certain claims, including your claim(s), listed below, all as set forth in the Objection.

<u>TO:</u>	<u>Claim Number</u>	<u>Asserted Claim Amount</u>	<u>Classification as Filed</u>
[Claimant Name] ¹			
[Claimant Address]			

YOU ARE RECEIVING THIS NOTICE BECAUSE THE PROOF(S) OF CLAIM LISTED HEREIN THAT YOU FILED AGAINST ONE OR MORE OF THE DEBTORS IN THE ABOVE-CAPTIONED CHAPTER 11 CASES ARE SUBJECT TO THE OBJECTION. YOUR RIGHTS MAY BE AFFECTED BY THE OBJECTION. THEREFORE, YOU SHOULD READ THIS NOTICE (INCLUDING THE OBJECTION AND OTHER ATTACHMENTS) CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

MOREOVER, PURSUANT TO RULE 3007-1 OF THE LOCAL RULES OF THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA AND THE OMNIBUS OBJECTION PROCEDURES, UNLESS A WRITTEN RESPONSE AND A REQUEST FOR A HEARING ARE FILED WITH THE CLERK OF THE COURT AND SERVED ON THE OBJECTING PARTY BY 4:00 P.M.(EASTERN) ON OCTOBER 27, 2009, THE COURT MAY DEEM ANY OPPOSITION WAIVED, TREAT THE OBJECTION AS CONCEDED AND ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT A HEARING.

Critical Information for Claimants
Choosing to File a Response to the Objection

¹ Personalized claim information is included in the personalized notices served on the Claimants listed on Exhibit B to the Objection.

Who Needs to File a Response: If you oppose the relief requested in the Objection and if you are unable to resolve the Objection with the Debtors before the deadline to respond, then you must file and serve a written response (the "Response") to the Objection in accordance with this Notice.

If you do not oppose the relief requested in the Objection, then you do not need to file a written Response to the Objection and you do not need to appear at the hearing.

Response Deadline: The Response Deadline is 4:00 p.m. (Eastern Time) on October 27, 2009 (the "Response Deadline").

THE BANKRUPTCY COURT WILL ONLY CONSIDER YOUR RESPONSE IF YOUR RESPONSE IS FILED, SERVED AND RECEIVED BY THE RESPONSE DEADLINE.

Your Response will be deemed timely filed only if the Response is actually received on or before the Response Deadline by the Bankruptcy Court at the following address:

Clerk of the Bankruptcy Court
United States Bankruptcy Court
701 East Broad Street - Room 4000
Richmond, Virginia 23219

Your Response will be deemed timely served only if a copy of the Response is actually received on or before the Response Deadline by the Debtors' attorneys:

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP One Rodney Square PO Box 636 Wilmington, DE 19899-0636 Attn: Gregg M. Galardi Attn: Ian S. Fredericks	MCGUIREWOODS LLP One James Center 901 E. Cary Street Richmond, VA 23219 Attn: Dion W. Hayes Attn: Douglas M. Foley
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- and -

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM, LLP
155 North Wacker Drive
Chicago, Illinois 60606
Attn: Chris L. Dickerson

The status hearing on the Objection will be held at
11:00 a.m. (Eastern) on November 3, 2009 at:

United States Bankruptcy Court
701 East Broad Street - Courtroom 5100
Richmond, Virginia 23219

If you file a timely Response, in accordance with the Objection Procedures, you do not need to appear at the status hearing on the Objection.

**Procedures for Filing a Timely Response and
Information Regarding the Hearing on the Objection**

Contents. To facilitate a speedy and non-judicial resolution of a Claim subject to the Objection, any claimant filing a Response shall use its best efforts to include the following (at a minimum) in its filed Response, to the extent such materials are not attached to its proof of claim:

- a. a caption setting forth the name of the Bankruptcy Court, the name of the Debtors, the case number and the title of the Objection to which the Response is directed;

- b. the claimant's name and an explanation for the amount of the Claim;
- c. a concise statement, executed by (or identifying by name, address and telephone number) a person with personal knowledge of the relevant facts that support the Response, setting forth the reasons why the Bankruptcy Court should overrule the Objection as to the claimant's claim, including, without limitation (to the extent not set forth in its proof of claim), the specific factual and legal bases upon which the claimant intends to rely in support of its Response and its underlying Claim;
- d. a copy of or identification of any other documentation or other evidence of the Claim, to the extent not already included with the Claim that the claimant presently intends to introduce into evidence in support of its Claim at the hearing; provided, however, that for a Response filed in support of a Claim arising out of a lease of real property, the Response need not attach such lease if the claimant indicates its willingness to provide such documentation upon request;
- e. a declaration of a person with personal knowledge of the relevant facts that support the Response; and
- f. the claimant's address, telephone number and facsimile number and/or the name, address, telephone number and facsimile number of the claimant's attorney and/or designated representative to whom the attorneys for the Debtors should serve a reply to the Response, if any (collectively, the "Notice Address"). If a Response contains Notice Address that is different from the name and/or address listed on the Claim, the Notice Address will control and will become the service address for future service of papers with respect to all of the claimant's Claims listed in the Objection (including all Claims to be

disallowed) and only for those Claims in the Objection.

- g. To the extent such person differs from the person identified pursuant to subsection e, above, the name, address, telephone number, facsimile number, and electronic mail address of the representative of the claimant (which representative may be the claimant's counsel) party with authority to reconcile, settle or otherwise resolve the Objection on the claimant's behalf (collectively, the "Additional Addresses"). Unless the Additional Addresses are the same as the Notice Addresses, the Additional Address will not become the service address for future service of papers.

Additional Information. To facilitate a resolution of the Objection, your Response should also include the name, address, telephone number and facsimile number of the party with authority to reconcile, settle or otherwise resolve the Objection on the claimant's behalf. Unless the Additional Addresses are the same as the Notice Addresses, the Additional Addresses will not become the service address for future service of papers.

Failure to File Your Timely Response. If you fail to file and serve your Response on or before the Response Deadline in compliance with the procedures set forth in this Notice, the Debtors will present to the Bankruptcy Court an appropriate order granting the relief requested in the Objection without further notice to you.

Each Objection Is a Contested Matter. Each Claim subject to the Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Bankruptcy Court will be deemed a separate order with respect to such claim.

Additional Information

Requests for Information. You may also obtain a copy of the Objection or related documents on the internet, by

accessing the website of the Debtors at www.kccllc.net/circuitcity.

Reservation of Rights. Nothing in this Notice or the Objection constitutes a waiver of the Debtors' right to assert any claims, counterclaims, rights of offset or recoupment, preference actions, fraudulent-transfer actions or any other claims against you by the Debtors. Unless the Bankruptcy Court allows your Claims or specifically orders otherwise, the Debtors have the right to object on any grounds to the Claims (or to any other Claims or causes of action you may have filed or that have been scheduled by the Debtors) at a later date on any grounds or bases. In such event, you will receive a separate notice of any such objections.

Dated: September 21, 2009
Richmond, Virginia

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